

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Civil Action No. 24-cv-12587

ZM QUANT INVESTMENT LTD.,
BAIJUN OU, a/k/a ERIC OU, and
RUIQI LAU, a/k/a RICKY LIU,

Defendants.

CERTIFICATION OF RELATEDNESS

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully states that pursuant to Local Rule 40.1(g)(2)(A), the above-captioned matter should be designated by the Clerk as related to the following previously filed criminal case: *United States v. ZM Quant Investment Ltd, Baijun Ou, and Ruiqi Liu*, Crim. No. 24-10187 (AK). In the criminal matter, the defendants were charged with conspiracy to commit market manipulation and wire fraud (18 U.S.C. § 371) and three counts of wire fraud (18 U.S.C. § 1343).

In the above-captioned matter, the Commission seeks injunctive relief, equitable relief, and civil monetary penalties for conduct that relates to the previously filed criminal case, including an alleged scheme involving the manipulation of the market for “Saitama,” “SaitaRealty,” and “NexFundAI,” all of which were crypto assets that were offered and sold as securities.

Further, and pursuant to Local Rule 40.1(g)(1), the above-captioned matter should also be designated by the Clerk as related to a previously filed civil case, *SEC v. Russell Armand et al.*, Civ. No. 24-12586. The Commission is the plaintiff in both matters, L.R. 40.1(g)(1)(A), and both

matters raise “substantially similar issues of fact,” L.R. 40.1(g)(1)(B)(i), including the alleged scheme to manipulate the market for Saitama and SaitaRealty.

Dated: October 9, 2024

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,

By its attorneys,

/s/ David J. D’Addio

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Certificate of Service

I, David J. D’Addio, certify that on October 9, 2024, I filed the foregoing motion electronically with the Court. The filing will be sent to the registered participants as identified on the Notice of Electronic Filing and may also be accessed through the Court’s ECF system.

/s/ David J. D’Addio

David J. D’Addio